

DANIEL G. BOGDEN
 United States Attorney
 District of Nevada
 Nevada State Bar No. 2137
 CARLOS A. GONZALEZ
 Assistant United States Attorney
 333 Las Vegas Blvd. So., #5000
 Las Vegas, Nevada 89101
 Ph: (702) 388-6336
 Fax: (702) 388-6787
 E-mail: Carlos.Gonzalez2@usdoj.gov
 Attorneys for the United States.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CARRIE L. ELLIS,)	Case No. 2:10-cv-01201-LDG-GWF
)	
Plaintiff,)	
)	
v.)	
)	
MICHAEL J. ASTRUE,)	
Commissioner of Social)	
Security,)	
)	
Defendant.)	
)	

UNOPPOSED DEFENDANTS' MOTION FOR EXTENSION OF TIME

(Second Request)

COMES NOW defendants, by and through their attorneys, Daniel G. Bogden, United States Attorney for the District of Nevada, and Carlos A. Gonzalez, Assistant United States Attorney, and request a thirty (30) day extension of time, to file an appropriate and meaningful response to Plaintiff's Request for Remand.

. . .

. . .

. . .

1 Defendants' current deadline to answer plaintiffs complaint
2 is April 21, 2011. Undersigned counsel must coordinate
3 defendants appropriate response to the complaint with the Social
4 Security Office of Regional Chief Counsel in San Francisco,
5 California. At the present time that office is preparing the
6 answers and pleadings to be filed on litigation presently pending
7 with various District Courts in the western region of the United
8 States as well as the 9th Circuit Court of Appeals. The agency
9 has expressed the need for a thirty (30) day extension of time to
10 file an appropriate response to the instant case.

11 On April 4, 2011, undersigned counsel contacted Mr. Marc V.
12 Kalagian, counsel for plaintiff to inform him of the need for the
13 instant motion for an extension of time. He indicated that he
14 does not have any objections.

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

1 It is therefore respectfully requested that defendants be
2 granted a thirty (30) day extension of time to file an
3 appropriate pleading to answer complaint up to and including May
4 23, 2011.

5 DATED this 6th day of April 2011.

6 Respectfully submitted,

7 DANIEL G. BOGDEN
8 United States Attorney

9 /s/ Carlos A. Gonzalez
10 CARLOS A. GONZALEZ
11 Assistant United States Attorney

12 IT IS SO ORDERED:

13 
14 UNITED STATES MAGISTRATE JUDGE

15 DATE: April 11, 2011
16
17
18
19
20
21
22
23
24
25
26